

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

WILLIAM E. DUGAN, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	CIVIL ACTION
vs.)	
)	NO. 07 C 4882
ZEMON CONCRETE CORPORATION,)	
an Illinois corporation, and PWDBE)	JUDGE WAYNE R. ANDERSEN
CONCRETE, INC., an Illinois corporation,)	
)	
Defendants.)	

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendants, ZEMON CONCRETE CORPORATION, an Illinois corporation, and PWDBE CONCRETE, INC., an Illinois corporation, in the total amount of \$18,157.85, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$1,217.50.

On September 6, 2007, the Summons and Complaint was served on the Registered Agent for Defendant, PWDBE CONCRETE, INC., by tendering a copy of said documents to Daniel R. Bronson, personally, at his place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant, PWDBE CONCRETE, INC.'s, answer was due on September 26, 2007.

On September 20, 2007, the Summons and Complaint was served on the Registered Agent for Defendant, ZEMON CONCRETE CORPORATION, by tendering a copy of said documents to the Illinois Secretary of State because the corporation's registered agent, could not, with reasonable diligence, be found at the registered office of record in Illinois (a copy of the Summons and

Affidavit of Compliance for Service on Secretary of State is attached hereto). Therefore, Defendant, ZEMON CONCRETE CORPORATION's, answer was due on October 10, 2007.

As Defendants have failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Patrick N. Ryan

Patrick N. Ryan
Attorney for Plaintiffs
BAUM SIGMAN AUERBACH & NEUMAN, LTD.
200 West Adams Street, Suite 2200
Chicago, IL 60606-5231
Bar No.: 6278364
Telephone: (312) 236-4316
Facsimile: (312) 236-0241
E-Mail: pryan@baumsigman.com

CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that he electronically filed the foregoing document (Motion for Entry of Default and Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participants on or before the hour of 5:00 p.m. this 11th day of October 2007:

Mr. William Perlman, Registered Agent
Zemon Concrete Corporation
544 W. Colfax, Suite 6
Palatine, IL 60067

Mr. Daniel R. Bronson, Registered Agent
PWDBE Concrete, Inc.
150 N. Wacker Drive, Suite 1400
Chicago, IL 60606

Jesse White
Secretary of State
Department of Business Services
Attn: File #3517-1321
Springfield, IL 62756

/s/ Patrick N. Ryan

Patrick N. Ryan
Attorney for Plaintiffs
BAUM SIGMAN AUERBACH & NEUMAN, LTD.
200 West Adams Street, Suite 2200
Chicago, IL 60606-5231
Bar No.: 6278364
Telephone: (312) 236-4316
Facsimile: (312) 236-0241
E-Mail: pryan@baumsigman.com